

assigned to them and (b) were subscribed to telephone service that was tariffed as “public” telephone service.

23. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones that both (a) had extensions connected to them and (b) were subscribed to telephone service that was tariffed as “public” telephone service.

24. Admit that, during the time period from 1987 through April 14, 1997, there were never any Sprint-owned payphones that were subscribed to telephone service that was tariffed as “public” telephone service and for which the premises owner paid Sprint a recurring fee.

25. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones that were both (a) located within buildings or premises closed to the public for at least part of each day and (b) “public” payphones under the Commission definition.

26. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones located at gas stations that were “public” payphones under the Commission definition.

27. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones located at pizza parlors that were “public” payphones under the Commission definition.

28. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones located in airports that were “semi-public” payphones under the Commission definition.

29. Admit that, during the time period from 1987 through April 14, 1997, Sprint allowed and/or did not prohibit directory listings on the phone lines to which Sprint-owned payphones were connected, irrespective of whether such payphones were “public” or “semi-public” payphones under the Commission definition.

30. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones that both (a) had directory listings assigned to them and (b) were “public” payphones under the Commission definition.

31. Admit that, during the time period from 1987 through April 14, 1997, there were Sprint-owned payphones that both (a) had extensions connected to them and (b) were “public” payphones under the Commission definition.

32. Admit that, during the time period from 1987 through April 14, 1997 there were never any Sprint-owned payphones that were subscribed to telephone service that was “public” under the Commission definition and for which the premises owner paid Sprint a recurring fee.

33. Admit that, during the time period from 1987 through April 14, 1997, Sprint had a business practice or policy regarding the termination and/or

suspension of telephone service for nonpayment and/or late payment of charges billed by Sprint.

34. Admit that, during the time period from April 15, 1997 through the present, Sprint had a business practice or policy regarding the termination and/or suspension of telephone service for nonpayment and/or late payment of charges billed by Sprint.

35. Admit that, during the time period from 1987 through April 14, 1997, it was Sprint's business practice or policy to terminate and/or suspend telephone service, upon appropriate notice and the expiration of the time period referenced in the applicable legal or tariff provisions relating to the termination and/or suspension of service for non-payment, if a residential or business line subscriber failed to pay the charges billed by Sprint.

36. Admit that, during the time period from 1987 through April 14, 1997, it was Sprint's business practice or policy to terminate and/or suspend telephone service, upon appropriate notice and the expiration of the time period referenced in the applicable legal or tariff provisions relating to the termination and/or suspension of service for non-payment, if an independent payphone service provider failed to pay the charges billed by Sprint.

37. Admit that, during the time period from 1987 through April 14, 1997, it was Sprint's business practice or policy to terminate and/or suspend telephone service, upon appropriate notice and the expiration of the time period referenced in the applicable legal or tariff provisions relating to the termination

and/or suspension of service for non-payment, if an independent payphone service provider failed to pay the EUCL charges billed by Sprint.

38. Admit that, during the time period from 1987 through April 14, 1997, you authorized and/or agreed to the placement in escrow of amounts assessed by Sprint against Complainant for EUCL charges billed on payphones that Complainant owned and/or operated in the State of Florida.

39. Admit that you are aware of one or more occasions, during the time period from 1987 through April 14, 1997, when Complainant placed in escrow amounts that you had assessed against Complainant for EUCL charges on payphones that Complainant owned and/or operated in the State of Florida.

40. Admit that you have in your possession, custody, or control records that indicate, relate or refer to the total number of payphones that Complainant had connected to Sprint payphone access lines during each month and/or each year of the time period from 1987 through April 14, 1997.

41. Admit that you have in your possession, custody, or control records that indicate, relate or refer to the date on which payphones owned and/or operated by Complainant in the State of Florida during the time period from 1987 through April 14, 1997 were first connected to Sprint payphone access lines.

42. Admit that you have in your possession, custody, or control records that indicate, relate or refer to the date on which payphones owned and/or operated by Complainant in the State of Florida during the time period from 1987 through

April 14, 1997 were disconnected from Sprint payphone access lines and/or last connected to Sprint payphone access lines.

43. Admit that you have in your possession, custody, or control records that indicate, relate or refer to the amounts that Complainant paid to Sprint in EUCL charges during the time period from 1987 through April 14, 1997.

44. Admit that New York City Telecommunications Company, Inc. is a successor to the entity that filed the Complaint against Sprint in this case, Millicom Services Company.

45. Admit that you are aware of no evidence that shows or indicates that New York City Telecommunications Company, Inc. is not a successor to the entity that filed the Complaint against Sprint in this case, Millicom Services Company.

46. Admit that at no time, during the period from 1987 through April 14, 1997, did Sprint ever adjust, for any reason, any telephone bill(s) sent to Complainant so as to remove any EUCL charges from the telephone bill(s).

47. Admit that the "previous balance" entries on the telephone bills sent out by Sprint during the time period from 1987 through April 14, 1997 reflect outstanding charges that remain unpaid from previous telephone bills sent out by Sprint for the same telephone lines.

48. Admit that an amount of zero next to the "previous balance" entry in a Sprint telephone bill sent out at any time during the period from 1987 through

April 14, 1997 means that all charges reflected on previous bills sent out by Sprint for the same telephone line have been paid.

49. Admit that, during the period from 1987 through April 14, 1997, it was Sprint's policy or practice to require certain subscribers to pay a deposit to Sprint in connection with Sprint's provision of service to those subscribers based upon those subscribers' credit histories, credit scores, or history of nonpayments or late payments to Sprint.


50. Admit that, during the period from 1987 through April 14, 1997, it was Sprint's policy or practice to require certain subscribers to pay a deposit to Sprint in connection with Sprint's provision of service to those subscribers based upon those subscribers' history of nonpayments or late payments to Sprint.

51. Admit that, during the period from 1987 through April 14, 1997, you never required Complainant to pay a deposit to Sprint in connection with Sprint's provision of service to Complainant because of Complainant's credit history, credit score, or history of nonpayments or late payments to Sprint.

Dated: July 18, 2001

Respectfully submitted,

DICKSTEIN SHAPIRO MORIN
& OSHINSKY LLP
2101 L Street, N.W.
Washington, D.C. 20037-1526
(202) 785-9700
Attorneys for Complainant

By: 
Albert H. Kramer
Katherine J. Henry

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2001, a copy of the foregoing Complainant's First Set of Requests for Admission of Facts and the Genuineness of Documents was served by facsimile and first-class mail, postage prepaid, on Rikke Davis, Esq., Sprint Corporation, 401 9th Street, NW, Suite 400, Washington, DC 20004, and on Mary Sisak, Esq., and Robert Jackson, Esq., Blooston, Mordkowsky, Dickens, Duffy & Prendergast, 2120 L Street, NW, Suite 300, Washington, DC 20037, and by first-class mail, postage prepaid, on the following parties:

The Honorable Arthur I. Steinberg
Administrative Law Judge
Federal Communications Commission
445 12th Street, SW
Room 1-C861
Washington, DC 20554

Magalie Roman Salas, Secretary
Office of the Commission Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, D.C. 20554
(Original and Three Copies)

Tejal Mehta, Esquire
Federal Communications Commission
Market Disputes Resolution Division
Enforcement Bureau
445 12th Street, SW
Washington, D.C. 20554

David H. Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
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Michael Thompson, Esquire
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Sherry A. Ingram, Esq.
Verizon
1320 North Court House Road
Arlington, VA 22201

John M. Goodman, Esq.
Verizon
1300 I Street, NW, 400W
Washington, DC 20005

William A. Brown, Esquire
Davida M. Grant, Esquire
Southwestern Bell Telephone Company
1401 I Street, NW, Suite 1100
Washington, D.C. 20005



Charles V. Mehler III

Sprint QA Report

LEC	Effective_Date	State	Rate_Per_Month
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Sprint Local Telephone Companies

12/25/1995

Florida	\$6.00
Illinois	\$5.56
Indiana	\$6.00
Kansas	\$6.00
Minnesota	\$6.00
Missouri	\$6.00
Nebraska	\$6.00
Nevada	\$3.46
New Jersey	\$6.00
North Carolina	\$6.00
Ohio	\$6.00
Oregon	\$6.00
Pennsylvania	\$5.84
South Carolina	\$6.00
Tennessee	\$5.64
Texas	\$6.00
Virginia	\$6.00
Washington	\$6.00
Wyoming	\$6.00

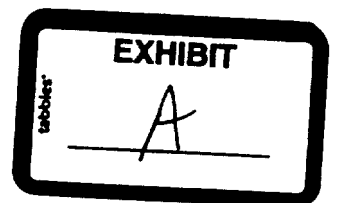
04/01/1997

Florida	\$6.00
Illinois	\$5.50
Indiana	\$5.98
Kansas	\$6.00
Minnesota	\$6.00
Missouri	\$6.00
Nebraska	\$6.00
Nevada	\$3.46
New Jersey	\$5.95
North Carolina	\$5.98
Ohio	\$5.97
Oregon	\$6.00
Pennsylvania	\$5.79
South Carolina	\$6.00
Tennessee	\$5.59
Texas	\$6.00
Virginia	\$6.00
Washington	\$6.00
Wyoming	\$6.00

07/01/1997

Monday, December 11, 2000

Page 1 of 7



United QA Report

LEC	Effective_Date	State	Rate_Per_Month
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United

01/01/1987

Arkansas	\$6.00
Florida	\$6.00
Indiana	\$6.00
Iowa	\$6.00
Kansas	\$6.00
Minnesota	\$5.49
Missouri	\$6.00
Nebraska	\$6.00
New Jersey	\$6.00
North Carolina	\$5.17
Ohio	\$5.59
Oregon	\$6.00
Pennsylvania	\$4.31
South Carolina	\$6.00
Tennessee	\$5.21
Texas	\$6.00
Virginia	\$6.00
Washington	\$6.00
Wyoming	\$6.00

01/21/1987

Arkansas	\$6.00
Florida	\$6.00
Indiana	\$6.00
Iowa	\$6.00
Kansas	\$6.00
Minnesota	\$5.49
Missouri	\$6.00
Nebraska	\$6.00
New Jersey	\$6.00
North Carolina	\$5.17
Ohio	\$5.59
Oregon	\$6.00
Pennsylvania	\$4.31
South Carolina	\$6.00
Tennessee	\$5.21
Texas	\$6.00
Virginia	\$6.00
Washington	\$6.00
Wyoming	\$6.00

01/01/1988

LEC	Effective_Date	State	Rate_Per_Month
		Arkansas	\$6.00
		Florida	\$6.00
		Indiana	\$6.00
		Iowa	\$5.33
		Kansas	\$6.00
		Minnesota	\$5.30
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.09
		Ohio	\$5.47
		Oregon	\$6.00
		Pennsylvania	\$3.96
		South Carolina	\$6.00
		Tennessee	\$5.28
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>05/01/1988</u>		
		Arkansas	\$6.00
		Florida	\$6.00
		Indiana	\$6.00
		Iowa	\$5.33
		Kansas	\$6.00
		Minnesota	\$5.30
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.09
		Ohio	\$5.47
		Oregon	\$6.00
		Pennsylvania	\$3.96
		South Carolina	\$6.00
		Tennessee	\$5.28
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>04/01/1989</u>		
		Arkansas	\$5.69
		Florida	\$6.00
		Indiana	\$6.00
		Iowa	\$4.66
		Kansas	\$6.00

LEC	Effective_Date	State	Rate_Per_Month
		Minnesota	\$5.20
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.89
		Ohio	\$5.24
		Oregon	\$6.00
		Pennsylvania	\$4.21
		South Carolina	\$6.00
		Tennessee	\$5.09
		Texas	\$6.00
		Virginia	\$5.99
		Washington	\$6.00
		Wyoming	\$6.00
	<u>07/01/1989</u>		
		Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$5.20
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.89
		Ohio	\$5.24
		Oregon	\$6.00
		Pennsylvania	\$4.21
		South Carolina	\$6.00
		Tennessee	\$5.09
		Texas	\$6.00
		Virginia	\$5.99
		Washington	\$6.00
		Wyoming	\$6.00
	<u>08/01/1989</u>		
		Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$5.20
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.57
		Ohio	\$5.08
		Oregon	\$6.00
		Pennsylvania	\$4.18
		South Carolina	\$6.00

LEC	Effective_Date	State	Rate_Per_Month
		Tennessee	\$5.04
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	01/01/1990		
		Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$5.67
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.63
		Ohio	\$5.35
		Oregon	\$6.00
		Pennsylvania	\$4.34
		South Carolina	\$6.00
		Tennessee	\$4.93
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	02/15/1990		
		Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.63
		Ohio	\$5.61
		Oregon	\$6.00
		Pennsylvania	\$4.34
		South Carolina	\$6.00
		Tennessee	\$4.93
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	07/01/1990		
		Florida	\$6.00
		Indiana	\$6.00

LEC	Effective_Date	State	Rate_Per_Month
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.67
		Ohio	\$5.81
		Oregon	\$6.00
		Pennsylvania	\$4.50
		South Carolina	\$6.00
		Tennessee	\$5.05
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	10/24/1990	Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.67
		Ohio	\$5.84
		Oregon	\$6.00
		Pennsylvania	\$4.54
		South Carolina	\$6.00
		Tennessee	\$5.10
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>01/01/1991</u>	Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.56
		Ohio	\$5.74
		Oregon	\$6.00
		Pennsylvania	\$4.44

LEC	Effective_Date	State	Rate_Per_Month
		South Carolina	\$6.00
		Tennessee	\$4.95
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>07/01/1992</u>		
		Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.09
		Ohio	\$5.53
		Oregon	\$6.00
		Pennsylvania	\$4.90
		South Carolina	\$6.00
		Tennessee	\$5.06
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>07/01/1993</u>		
		Florida	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		New Jersey	\$6.00
		North Carolina	\$5.70
		Ohio	\$6.00
		Oregon	\$6.00
		Pennsylvania	\$5.75
		South Carolina	\$6.00
		Tennessee	\$5.62
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>03/02/1994</u>		
		Florida	\$6.00

LEC	Effective_Date	State	Rate_Per_Month
		Illinois	\$6.00
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		Nevada	\$3.85
		New Jersey	\$6.00
		North Carolina	\$5.70
		Ohio	\$6.00
		Oregon	\$6.00
		Pennsylvania	\$5.75
		South Carolina	\$6.00
		Tennessee	\$5.62
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>07/01/1994</u>		
		Florida	\$6.00
		Illinois	\$5.90
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Mississippi	\$6.00
		Nebraska	\$6.00
		Nevada	\$3.60
		New Jersey	\$5.94
		North Carolina	\$6.00
		Ohio	\$6.00
		Oregon	\$6.00
		Pennsylvania	\$5.65
		South Carolina	\$6.00
		Tennessee	\$5.35
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	<u>03/03/1995</u>		
		Florida	\$6.00
		Illinois	\$5.90
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00

LEC	Effective_Date	State	Rate_Per_Month
		Nebraska	\$6.00
		Nevada	\$3.60
		New Jersey	\$5.77
		North Carolina (Central)	\$6.00
		North Carolina (United)	\$6.00
		Ohio	\$6.00
		Oregon	\$6.00
		Pennsylvania	\$5.77
		South Carolina	\$5.65
		Tennessee	\$5.65
		Texas (Central)	\$6.00
		Texas (United)	\$6.00
		Virginia (Central)	\$6.00
		Virginia (United)	\$5.65
		Washington	\$6.00
		Wyoming	\$6.00
	08/01/1995		
		Florida	\$6.00
		Illinois	\$5.56
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00
		Missouri	\$6.00
		Nebraska	\$6.00
		Nevada	\$3.46
		New Jersey	\$6.00
		North Carolina (Central)	\$6.00
		North Carolina (United)	\$6.00
		Ohio	\$6.00
		Oregon	\$6.00
		Pennsylvania	\$5.84
		South Carolina	\$6.00
		Tennessee	\$5.64
		Texas (Central)	\$6.00
		Texas (United)	\$6.00
		Virginia (Central)	\$6.00
		Virginia (United)	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
	12/16/1995		
		Florida	\$6.00
		Illinois	\$5.56
		Indiana	\$6.00
		Kansas	\$6.00
		Minnesota	\$6.00

LEC	Effective_Date	State	Rate_Per_Month
		Missouri	\$6.00
		Nebraska	\$6.00
		Nevada	\$3.46
		New Jersey	\$6.00
		North Carolina	\$6.00
		Ohio	\$6.00
		Oregon	\$6.00
		Pennsylvania	\$5.84
		South Carolina	\$6.00
		Tennessee	\$5.64
		Texas	\$6.00
		Virginia	\$6.00
		Washington	\$6.00
		Wyoming	\$6.00
<u>United Inter-Mountain Telephone Company</u>			
	06/01/1986		
		Tennessee	\$3.97
		Virginia	\$4.82
<u>United Telephone Company of Florida</u>			
	06/01/1986		
		Florida	\$6.00
<u>United Telephone Company of Indiana, Inc.</u>			
	06/01/1986		
		Indiana	\$6.00
<u>United Telephone Company of Ohio</u>			
	06/01/1986		
		Ohio	\$5.27
<u>United Telephone Company of Texas, Inc</u>			
	06/01/1986		
		Texas	\$5.38
<u>United Telephone Company of the Carolinas</u>			
	06/01/1986		
		South Carolina	\$5.89
<u>United Telephone System</u>			
	06/01/1986		
		Arkansas	\$6.00
		Iowa	\$5.30
		Kansas	\$6.00
		Minnesota	\$4.84
		Missouri	\$6.00
		Nebraska	\$6.00
		Wyoming	\$6.00

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
C.F. Communications Corp., et al.) EB Docket No. 01-99
) File No. E-93-43
Complainants,)
)
v.)
)
Century Telephone of Wisconsin,)
Inc., et al.)
)
Defendants)

To: Administrative Law Judge Arthur I. Steinberg
and Ascom Communications, Inc. n/k/a Ascom Holding, Inc.

**CAROLINA TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE TO COMPLAINANT'S FIRST SET OF REQUESTS
FOR ADMISSION OF FACTS AND THE GENUINENESS OF DOCUMENTS**

Carolina Telephone and Telegraph Company, the Defendant in File No. E-93-43, by its attorneys and pursuant to Section 1.246 of the Commission's Rules, hereby responds to the "Complainant's First Set of Requests for Admission of Facts and Genuineness of Documents" propounded by the Complainant, Ascom Communications, Inc. n/k/a Ascom Holding, Inc., on July 18, 2001. The Defendant's responses are as follows:

Request No. 1: Admit that all of the ANIs identified in your response to Interrogatory Number 3 of Complainant's First Set of Interrogatories to Defendant in the above referenced proceeding were "public" payphones under the Commission definition during the time period from 1987 through April 14, 1997.

Response to Request No. 1: Denied. In addition, Defendant did not identify specific ANIs in its response to Interrogatory No.

- 2 -

3 for the reasons stated in its answers dated July 6, 2001.

Request No. 2: Admit that you are not aware of any evidence that shows or indicates that any of the ANIs identified in your response to Interrogatory Number 3 of Complainant's First Set of Interrogatories to Defendant in the above referenced proceeding were not "public" payphones under the Commission definition during the time period from 1987 through April 14, 1997.

Response to Request No. 2: Denied. In addition, Defendant did not identify specific ANIs in its response to Interrogatory No. 3 for the reasons stated in its answers dated July 6, 2001.

Request No. 3: Admit that none of the ANIs identified in your response to Interrogatory Number 3 of Complainant's First Set of Interrogatories to Defendant in the above referenced proceeding subscribed to telephone service that was tariffed as "semi-public" telephone service at any point during the time period from 1987 through April 14, 1997.

Response to Request No. 3: Denied. In addition, Defendant did not identify specific ANIs in its response to Interrogatory No. 3 for the reasons stated in its answers dated July 6, 2001.

Request No. 4: Admit that during the time period from 1987 through April 14, 1997, you imposed EUCL charges on payphones owned and/or operated by independent payphone service providers that obtained payphone access lines from Sprint, but did not impose EUCL charges on payphones owned and/or operated by Sprint that were tariffed as "public" rather than "semi-public" telephone lines.

Response to Request No. 4: Defendant admits that, during the

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time period stated, it imposed EUCL charges on payphones owned by independent payphone providers that obtained payphone access lines from Defendant. An objection is interposed to the balance of Request No. 4 because neither the classification of the Defendant's payphones nor the provisions of the Defendant's tariff are at issue in this case, and, accordingly, the admission requested is irrelevant to the issues presented.

Request No. 5: Admit that the table attached as Exhibit A accurately and completely reflects the amount of EUCL rates imposed by Sprint per payphone access line per month in the States of North Carolina and/or South Carolina during the time periods set forth in the table.

Response to Request No. 5: Admitted.

Request No. 6: Admit that Complainant paid all EUCL charges billed by Sprint on the payphone access lines subscribed to by Complainant in the States of North Carolina and/or South Carolina during the period from 1987 through April 14, 1997.

Response to Request No. 6: Denied.

Request No. 7: Admit that you are not aware of any evidence that shows or indicates that Complainant never paid any of the EUCL charges billed by Sprint on the payphone access lines subscribed to by Complainant in the States of North Carolina and/or South Carolina during the period from 1987 through April 14, 1997.

Response to Request No. 7: Denied.

Request No. 8: Admit that Complainant paid all of the EUCL charges billed by Sprint on the payphone access lines subscribed

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to by Complainant in the States of North Carolina and/or South Carolina during the time period from 1987 through April 14, 1997 on or prior to the due date.

Response to Request No. 8: Denied.

Request No. 9: Admit that you are not aware of any evidence that shows or indicates that Complainant paid, after the due date, any of the EUCL charges billed by Sprint on the payphone access lines subscribed to by Complainant in the States of North Carolina and/or South Carolina during the time period from 1987 through April 14, 1997.

Response to Request No. 9: Denied.

Request No. 10: Admit that none of the payphones owned and/or operated by Complainant in the States of North Carolina and/or South Carolina and connected to Sprint phone lines were "semi-public" payphones under the Commission definition during the time period from 1987 through April 14, 1997.

Response to Request No. 10: Denied.

Request No. 11: Admit that you are not aware of any evidence that shows or indicates that any of the payphones owned and/or operated by Complainant in the States of North Carolina and/or South Carolina were "semi-public" payphones under the Commission definition during the time period from 1987 through April 14, 1997.

Response to Request No. 11: Denied.

Request No. 12: Admit that none of the payphones owned and/or operated by Complainant in the States of North Carolina and/or South Carolina and connected to Sprint payphone access lines were

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subscribed to telephone service that was "semi-public" telephone service under the applicable tariff during the time period from 1987 through April 14, 1997.

Response to Request No. 12: Objection. The provisions of the Defendant's tariff speak for themselves, and the provisions of the tariff are irrelevant to the issues presented in this case.

Request No. 13: Admit that none of the payphones owned and/or operated by Complainant in the States of North Carolina and/or South Carolina and connected to Sprint payphone access lines during the time period from 1987 through April 14, 1997 had extensions connected to them.

Response to Request No. 13: Denied.

Request No. 14: Admit that you are not aware of any evidence that shows or indicates that any of the payphones owned and/or operated by Complainant in the States of North Carolina and/or South Carolina and connected to Sprint payphone access lines during the time period from 1987 through April 14, 1997 had extensions connected to them.

Response to Request No. 14: Denied.

Request No. 15: Admit that none of the payphones owned and/or operated Complainant in the States of North Carolina and/or South Carolina and connected to Sprint payphone access lines during the time period from 1987 through April 14, 1997 had directory listings assigned to them.

Response to Request No. 15: Denied.

Request No. 16: Admit that you are not aware of any evidence